

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

CLINT CARR,

Defendant.

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Case No. 4:18-CR-339-2

AGREED STIPULATION OF EXPECTED TESTIMONY
(CHEMIST TESTIMONY)

COMES NOW the United States of America through the undersigned Trial Attorneys, defendant Clint Carr, through his attorney, Michael Wynne, and enter with the Court the following agreed stipulation.

If Victor Bravenec were called upon to testify, he would testify substantially as follows: That he is Victor Bravenec, a Senior Forensic Chemist with the Drug Enforcement Administration (DEA) in Dallas, Texas, qualified to conduct scientific and chemical analyses to determine the chemical content of substances. He has had extensive training in analyzing various substances for their chemical content, and he has performed many such analyses for controlled substances. Furthermore, he conducted the following analysis in this case:

Count 4

On August 1, 2017, tablets thought to be Oxycodone, marked as Government Exhibit No. 307, photographed in Government Exhibit No. 301, and identified as DEA Drug Exhibit 1 under Agency case number M3-17-2045, were received via registered mail at the DEA laboratory in Dallas, Texas. On November 8, 2018, scientific and chemical analyses were conducted on the substances, and the conclusion from the analyses was that the substances contained in Exhibit

No. 307, photographed in Government Exhibit No. 301, and identified as DEA Drug Exhibit 1 under Agency case number M3-17-2045, contained Oxycodone, a substance in Schedule II of the Controlled Substances Act.

Also on August 1, 2017, tablets thought to be Hydrocodone, marked as Government Exhibit No. 308, photographed in Government Exhibit No. 301, and identified as DEA Drug Exhibit 3 under Agency case number M3-17-2045, were received via registered mail at the DEA laboratory in Dallas, Texas. On October 29, 2018, scientific and chemical analyses were conducted on the substances, and the conclusion from the analyses was that the substances contained in Exhibit No. 308, photographed in Government Exhibit No. 301, and identified as DEA Drug Exhibit 3 under Agency case number M3-17-2045, contained Hydrocodone, a substance in Schedule II of the Controlled Substances Act.

Count 5

On August 7, 2017, tablets thought to be Oxycodone, marked as Government Exhibit No. 309, photographed in Government Exhibit No. 303, and identified as DEA Drug Exhibit 4 under Agency case number M3-17-2045, were received via registered mail at the DEA laboratory in Dallas, Texas. On November 8, 2018, scientific and chemical analyses were conducted on the substances, and the conclusion from the analyses was that the substances contained in Exhibit No. 309, photographed in Government Exhibit No. 303, and identified as DEA Drug Exhibit 4 under Agency case number M3-17-2045, contained Oxycodone, a substance in Schedule II of the Controlled Substances Act.

Also on August 7, 2017, tablets thought to be Hydrocodone, marked as Government Exhibit No. 310, photographed in Government Exhibit No. 303, and identified as DEA Drug Exhibit 6 under Agency case number M3-17-2045, were received via registered mail at the DEA

laboratory in Dallas, Texas. On October 29, 2018, scientific and chemical analyses were conducted on the substances, and the conclusion from the analyses was that the substances contained in Exhibit No. 310, photographed in Government Exhibit No. 303, and identified as DEA Drug Exhibit 6 under Agency case number M3-17-2045, contained Hydrocodone, a substance in Schedule II of the Controlled Substances Act.

Count 2

On August 24, 2017, tablets thought to be Oxycodone, marked as Government Exhibit No. 311, photographed in Government Exhibit No. 305, and identified as DEA Drug Exhibit 7 under Agency case number M3-17-2045, were received via registered mail at the DEA laboratory in Dallas, Texas. On November 8, 2018, scientific and chemical analyses were conducted on the substances, and the conclusion from the analyses was that the substances contained in Exhibit No. 311, photographed in Government Exhibit No. 303, and identified as DEA Drug Exhibit 7 under Agency case number M3-17-2045, contained Oxycodone, a substance in Schedule II of the Controlled Substances Act.

Count 3

On August 24, 2017, tablets thought to be Oxycodone, marked as Government Exhibit No. 508, photographed in Government Exhibit No. 505, and identified as DEA Drug Exhibit 8 under Agency case number M3-17-2045, were received via registered mail at the DEA laboratory in Dallas, Texas. On November 8, 2018, scientific and chemical analyses were conducted on the substances, and the conclusion from the analyses was that the substances contained in Exhibit No. 508, photographed in Government Exhibit No. 505, and identified as DEA Drug Exhibit 8 under Agency case number M3-17-2045, contained Oxycodone, a substance in Schedule II of the Controlled Substances Act.


A copy of the results of the scientific and chemical analyses is attached and made a part of this stipulation.

We, the undersigned, have read, understand, and agree to the foregoing stipulation.

Respectfully submitted,

JENNIFER B. LOWERY
UNITED STATES ATTORNEY

By: /s/Devon Helfmeyer
Devon Helfmeyer
Courtney Chester
Trial Attorneys
United States Department of Justice
Fraud Section, Criminal Division



Michael Wynne
Attorney for Clint Carr